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September 14, 2006

Reference No. 6029-10

Mr. Regan S. Williams State Project Coordinator Ohio EPA - Division of Emergency & Remedial Response 2110 East Aurora Road Twinsburg, Ohio 44087

Dear Mr. Williams:

Re: Annual Progress Report No. 11

Operation, Maintenance, and Monitoring

Summit National Superfund Site, Deerfield Township of Portage County, Ohio

In accordance with Paragraph XI.A of the Consent Decree for the Summit National Superfund Site (Site) in Deerfield Township of Portage County, Ohio, the Summit National Facility Trust (SNFT) hereby submits two copies of the Annual Progress Report No. 11 for the operation, maintenance, and monitoring activities at the Site. This annual progress report summarizes the operation, maintenance, and monitoring activities conducted at the Site during the period of September 1, 2005 to August 31, 2006.

Should you have any questions, please do not hesitate to contact the undersigned.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Steve Whillier

SAW/saw/Will-052

Encl.

c.c. Pablo Valentin - USEPA RPM (2 copies)

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ANNUAL PROGRESS REPORT NO. 11

OPERATION, MAINTENANCE, AND MONITORING PERIOD SUMMIT NATIONAL SUPERFUND SITE DEERFIELD, OHIO

PERIOD: SEPTEMBER 1, 2005 TO AUGUST 31, 2006

This annual progress report is submitted to the United States Environmental Protection Agency (USEPA) and the Ohio Environmental Protection Agency (OEPA) by the Summit National Facility Trust Fund (SNFT) as required by Paragraph XI A. of the Consent Decree for the Summit National Superfund Site (Site) in Deerfield, Ohio.

A. GROUNDWATER EXTRACTION AND TREATMENT SYSTEM

- 1. The groundwater extraction and treatment systems at the Site were shut down on August 31, 2005 for the one year no-pumping groundwater migration evaluation approved by OEPA and USEPA. During the period of September 1, 2005 to August 31, 2006 no groundwater was pumped from the extraction system or treated at the on-Site treatment system.
- 2. The groundwater extraction and treatment system was shut down for the reporting period and thus no sampling was conducted on the treatment plant influent or effluent.
- 3. A summary of the major maintenance activities associated with the groundwater extraction and treatment systems at the Site is presented in Table 1. In summary, the only maintenance activities performed during the reporting period consisted of cleanout of all of the process piping and tanks after shut down of the groundwater extraction and treatment system in August 2005.
- 4. No modifications to the groundwater extraction and treatment systems were implemented during the reporting period.
- 5. Sampling of the vapor phase carbon adsorber discharge was not completed during the reporting period as the groundwater extraction and treatment system was not operational.
- 6. In a letter dated June 27, 2006, CRA confirmed the approval by OEPA for the SNFT to leave the groundwater extraction and treatment system off until further discussion with USEPA and OEPA following SNFT's submission of the 1-year post-shutdown groundwater conditions monitoring report in November 2006.

B. GROUNDWATER MONITORING

- 1. Three groundwater quality monitoring events were conducted at the Site during this reporting period as follows:
 - a) the November 2005 interim groundwater monitoring was conducted during the period of November 14 to 15, 2005. The results of the November 2005 groundwater monitoring were submitted to the USEPA and OEPA on February 9, 2006;
 - b) the 6-month groundwater conditions sampling was conducted from February 20 to March 9, 2006. The results of the 6-month groundwater sampling were submitted to the USEPA and OEPA on June 6, 2006; and
 - c) the 1-year post-shutdown groundwater conditions sampling was conducted from August 14 to 18, 2006. The results of the 1-year groundwater sampling will be submitted to the USEPA and OEPA within 45 days of receipt of the final analytical results from the project laboratory.
- 2. Six groundwater hydraulic monitoring events were conducted at the Site during the reporting period as follows:
 - a) the September 2005 groundwater hydraulic monitoring event was conducted at the Site on September 25, 2005, and was reported to USEPA and OEPA on December 20, 2005;
 - b) the October 2005 groundwater hydraulic monitoring event was conducted at the Site on October 27, 2005, and was reported to USEPA and OEPA on December 20, 2005;
 - c) the November 2005 groundwater hydraulic monitoring event was conducted at the Site on November 28, 2005, and was reported to USEPA and OEPA on February 9, 2006;
 - d) the February 2006 groundwater hydraulic monitoring event was conducted at the Site on February 20, 2006, and was reported to USEPA and OEPA on June 6, 2006;
 - e) the May 2006 groundwater hydraulic monitoring event was conducted at the Site on May 30, 2006, and was reported to the USEPA and OEPA on August 25, 2006; and
 - f) the August 2006 groundwater hydraulics monitoring event was conducted at the Site on August 14, 2006, and will be reported to USEPA and OEPA with the August 2006 1-year post-shutdown groundwater monitoring report.

C. GENERAL SITE MAINTENANCE

1. SNFT provided general Site maintenance activities as required by the Operation, Maintenance and Monitoring Plan (OMMP) for the Site for this reporting period.

D. GROUNDWATER MIGRATION EVALUATION

1. SNFT continued implementation of the approved Work Plan for Groundwater Migration Evaluation.

E. MISCELLANEOUS

- 1. Prepared and submitted the September 1, 2004 through August 31, 2005 Annual Progress Report No. 10 to USEPA and OEPA on September 12, 2005.
- 2. The annual sediment sample and surface water samples were obtained at the confluence of the south and east drainage ditches adjacent to the Site on August 18, 2006. The analytical results will be reported to USEPA and OEPA with the August 2006 1-year post-shutdown groundwater monitoring report.

F. ACTIVITIES SCHEDULED FOR NEXT REPORTING PERIOD

- 1. Continue general Site maintenance and monitoring.
- 2. Conduct annual sediment and surface water sampling at the confluence of the south and east drainage ditches, and submit the analytical results to USEPA and OEPA.
- 3. Conduct quarterly groundwater hydraulic monitoring in November 2006, February, May and August 2007, and submit the results to USEPA and OEPA.
- 4. Conduct annual groundwater quality monitoring in 2007, and submit the analytical results to USEPA and OEPA.
- 5. Continue implementation of the groundwater migration evaluation including the following activities:
 - Preparation and submission of the groundwater monitoring report for the August 2006 1-year post-shutdown groundwater monitoring event; and
 - Continue negotiations with USEPA and OEPA for the continued remediation of the Site.

TABLE 1

SUMMARY OF MAJOR MAINTENANCE ACTIVITIES GROUNDWATER EXTRACTION AND TREATMENT SYSTEMS SUMMIT NATIONAL SUPERFUND SITE DEERFIELD, OHIO

- 1. System force main cleaned. (October 2005)
- 2. Drained and cleaned all process equipment tanks (E.Q. / Aeration tanks, surge tanks #1,#2, and #3). Drained and cleaned sand filter. (October 2005)
- 3. Plant transfer piping cleaned and inspected. (E.Q. Aeration tank to clarifier, and from surge tank #1 to sand filter). (October 2005)
- 4. Removed spent carbon from the X-4 Carbon Adsorber. (October 2005)